

Drée Ann Cellemme  
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PRO SE PLAINTIFF

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

<b>DRÉE ANN CELLEMME,</b>	)	Case No. 2:16-cv-02539-JAD-CWH
	)	
Plaintiff,	)	
	)	<b>FIRST REQUEST</b>
v.	)	<b>STIPULATION FOR</b>
	)	<b>EXTENSION OF TIME TO</b>
<b>MATTHEW G. WHITAKER,</b> Acting	)	<b>FILE DISCOVERY PLAN /</b>
Attorney General, U.S. Department of	)	<b>SCHEDULING ORDER</b>
Justice,	)	
	)	
Defendant.	)	
	)	
_____	)	

COME NOW Plaintiff, Drée Ann Cellemme, and Defendant Matthew G. Whitaker<sup>1</sup>, Acting Attorney General, U.S. Department of Justice, and hereby stipulate and agree to a 60-day extension to file their Discovery Plan / Scheduling Order which is currently due on December 16, 2018. This is the parties' first extension request since the Court denied Defendant's motion to dismiss. Pursuant to the Order Denying Government's Motion to Dismiss (ECF. No. 62), the case was referred to the Pro Bono Liaison for the appointment of counsel for Plaintiff. The Pro Bono Liaison has been diligent in their efforts to obtain counsel on Plaintiff's behalf. However, they have been unable thus far to obtain counsel for Plaintiff. Therefore, additional time would give the Pro Bono Liaison a meaningful time to obtain appointed counsel for Plaintiff. A 60-day

<sup>1</sup> The successor to Attorney General Jefferson B. Sessions III has been automatically substituted in the case caption.

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2 extension would give the parties up to and including February 15, 2019, in which to file their  
3 Discovery Plan / Scheduling Order.

4 Plaintiff has contacted Defendant's attorney via email, who has advised that she has no  
5 objections to Plaintiff's request. Plaintiff seeks this extension request in good faith and not for  
6 the purpose of delay.

7 Dated this 4th day of December 2018.

8  
9 DRÉE ANN CELLEMME

DAYLE ELIESON  
UNITED STATES ATTORNEY

10  
11 /s/ Drée Ann Cellemme  
12 DRÉE ANN CELLEMME  
13 PRO SE PLAINTIFF  
14 11035 Lavender Hill Drive,  
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/s/ Holly A. Vance  
HOLLY A. VANCE  
ASSISTANT UNITED STATES ATTORNEY

16 IT IS SO ORDERED.

17 DATED: December 6, 2018

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19   
20 C.W. HOFFMAN, JR.  
UNITED STATES MAGISTRATE JUDGE